



4. Recognizing the Court's disfavor for sealed filings, the Parties agree to 1) attempt to ensure the use of a "CONFIDENTIAL" or "ATTORNEY'S EYES ONLY" designation, as described in the attached proposed Stipulated Protective Order, is limited only to circumstances where it is unambiguously appropriate and 2) agree to collaboratively use redactions in filings whenever possible so as to avoid the filing of motions to seal.

5. This motion is supported by good cause.

WHEREFORE, the Parties hereby respectfully request that this Joint Motion for Protective Order be granted.

Dated: February 13, 2024

Respectfully submitted,

/s/ Eric P. Burns

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2024, I caused a true and correct copy of the foregoing to be served via electronic mail on the following:

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